

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC.,
formerly known as
HELLER HEALTHCARE FINANCE, INC.
Plaintiff,

vs.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA.
Defendant.

Civil Action No. 05-11128 NG

ASSENTED TO MOTION TO CONTINUE MEDIATION

Plaintiff GE HFS Holdings, Inc., formerly known as Heller Healthcare Finance, Inc. (“Heller”), hereby respectfully requests that the mediation presently scheduled for January 19, 2006 be continued until a date convenient for the Court but not less than forty five (45) days from the present mediation date. In support hereof, Heller states as follows:

1. Counsel for Heller is scheduled to begin on January 30, 2005 a three-week jury trial in the Norfolk Superior Court.

2. In addition, on December 12, 2005, the Court permitted Michael Ingoldsby (“Ingoldsby”) to intervene in this matter and to add another new party to this action the intervener-defendant, International Insurance Group, Ltd. (“International”).

3. In light of the addition of two new parties to this matter and Heller’s counsel’s impending trial, Heller respectfully requests that the presently scheduled mediation be continued for forty five (45) days to permit the parties to this action an opportunity to more fully develop their understanding of each parties’ positions and to more thoroughly prepare for the mediation.

4. Counsel for all other parties have assented to this motion.

WHEREFORE Heller respectfully requests that the mediation presently scheduled for January 19, 2006 be continued for not less than forty-five (45) days and that the Court grant such further and additional relief as it deems just and proper.

Respectfully submitted,

GE HFS HOLDINGS, INC.,
formerly known as
HELLER HEALTHCARE FINANCE, INC.,

By its attorneys,

/s/ Jeffrey E. Francis

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January 10, 2006

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 10, 2006.

/s/ Jeffrey E. Francis